

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA

Joshua Washburn

Ethan Hutson

Jackson Thompson

*(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

**-against-**

Town Hall (Blackville) Fonda Patrick

Rennie Purnell, Miles Leadbolt

Ray Crawford

*(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)*

**Complaint for Violation of Civil Rights**  
(Non-Prisoner Complaint)

Case No. \_\_\_\_\_  
(to be filled in by the Clerk's Office)

Jury Trial: ☐ Yes ☐ No  
(check one)

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**NOTICE**

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

**I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Joshua Washburn, Jackson Thompson, Ethan Hutson</u>
Street Address	<u>338 Franklin Street</u>
City and County	<u>Barnwell, Barnwell</u>
State and Zip Code	<u>SC 29812</u>
Telephone Number	<u>(803) 571-8456</u>

**B. The Defendant(s)**

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

**Defendant No. 1**

Name	<u>Fonda Patrick</u>
Job or Title (if known)	<u>Town Administrator</u>
Street Address	<u>5997 Larkspur ST</u>
City and County	<u>Blackville, Barnwell</u>
State and Zip Code	<u>SC 29817</u>
Telephone Number	<u>(803) 284-2444</u>
<input checked="" type="checkbox"/> Individual capacity	<input checked="" type="checkbox"/> Official capacity

**Defendant No. 2**

Name	<u>Ronnie Purnell</u>
Job or Title (if known)	<u>Mayor</u>
Street Address	<u>5997 Larkspur ST</u>
City and County	<u>Blackville, Barnwell</u>
State and Zip Code	<u>SC 29817</u>

(continued on next pg)

(Defendant No. 2 continued)

Telephone Number (803) 284-2444☒ Individual capacity☒ Official capacity

## Defendant No. 3

Name

Miles LoadholtJob or Title  
(if known)Town Attorney

Street Address

5997 Lartigue St

City and County

Blackville

State and Zip Code

SC 29817

Telephone Number

(803) 284-2444☒ Individual capacity☒ Official capacity

## Defendant No. 4

Name

Ray CrawfordJob or Title  
(if known)Chief of Police

Street Address

5997 Lartigue St

City and County

Blackville (Barnwell county)

State and Zip Code

South Carolina 29817

Telephone Number

(803) 284-2444☒ Individual capacity☒ Official capacity**II. Basis for Jurisdiction**

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

☐ Federal officials (a *Bivens* claim)

☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If

you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

First Amendment, Fourth Amendment, Fifth Amendment  
Sixth Amendment

- C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Fonda Patrick (on Film) Denial of Rights, Violation of FOIA  
RAY Crawford (on Film) Denial of Rights, Violation of FOIA  
Ronnie Purcell Denial of Right to Redress  
(No way to contact) MILES Logdhoft interactive counsel

### III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

See attached statements

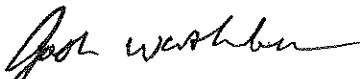
## Statement: Incident #1

On or about December 1, 2023, Mr. Washburn, Mr. Hutson, and Mr. Thompson; Traveled up to the Blackville Town Hall/Police Department to 1) file court paperwork including a Rule 5 Motion of Discovery, and a Motion to Dismiss to the Clerk of Court. 2) To gather Complaint forms from the Blackville Police Department. 3) Make a Freedom of Information Act request with the Blackville Town Hall and one with the Blackville Police Department.

When Mr. Washburn, Mr. Hutson, and Mr. Thompson arrived at the Town Hall, the three (Mr. Washburn, Mr. Hutson, Mr. Thompson) began filming the experience. After reaching the Police Department window and noticing it was closed, Mr. Washburn, Mr. Hutson, and Mr. Thompson made it the short way to the Clerk of the Court window. Here they were greeted by a new Clerk in training, and one Mrs. Fonda Patrick the Town Administrator. Mrs. Patrick attempted to give misinformation on how to file Court documents while under guidance of an Attorney on the phone with the Clerk in training. After being denied the right to file Mr. Washburn's court documents and to file the Freedom of Information Act with the Clerk of Court window, Mrs. Patrick took the role of the Blackville Police Department window. Mr. Washburn being the lead, requested for the Citizen Complaint forms for each member of the three man group plus three more complaint forms for others. Mrs. Patrick informed Mr. Washburn, Mr. Hutson, and Mr. Thompson that the Chief Ray Crawford was on the way. Then changed her story to Chief Crawford was in training.

When attempting to gain the complaint forms Town Administrator Fonda Patrick made the statement that the Chief was on the way, when in reality one Corporal Thorpe Badge number 6 showed up and attempted to gain Identification in order to gain access to the request being made by Mr. Washburn, Mr. Hutson, and Mr. Thompson. At this time, Fonda Patrick stated that her feelings about us wearing mask and filming made her and her staff nervous. Mrs. Patrick also stated to Mr. Washburn, Mr. Hutson, and Mr. Thompson that their constitutional rights did not matter when their feelings are involved. After the short back and fourth between Mr. Washburn and Mrs. Patrick, Corporal Thorpe requested ID or he was not going to assist in the request being made. When Mr. Washburn, Mr. Hutson, and Mr. Thompson respectfully declined the Corporals request, Corporal Thorpe, unbecoming of an Peace Officer made the mistake of denying a constitutional rights to be in a public space peacefully assembling which is protected under the first amendment, assisted in denying a constitutional right to a fair trial by refusing to uphold the oath he swore, by attempting to lie about the Town Hall being private property. The same can be said for one Town Administrator Fonda Patrick, as well as Chief Ray Crawford for his hiring practices and poor training of his subordinates, as well as Chief Crawford's poor education on Constitutional Rights, in which he swore to uphold. The First Amendment, The Fifth Amendment, and the Fourteenth Amendment have been clearly established and violated in this case. Feelings do not Trump Constitutional Rights. Ignorantia juris non excusant!

All of this is captured on video with three different perspectives and will be submitted as evidence, for the camera never lies.

  
Josh Washburn

  
Ethan Hutson

  
Jackson Thompson

## STATEMENT: Incident #2

On or about December 21, 2023 Mr. Washburn, Mr. Hutson and Mr. Thompson filed a Freedom of Information Act (FOIA) request form to one Fonda Patrick. Fonda accepted this request on film by three different angles. By law, according to the South Carolina FOIA, the servicing agency has 10 days to respond, with an additional 10 days as an extension. Mr. Washburn, Mr. Hutson and Mr. Thompson have given the Town Hall more than enough time to produce the public records requested, with no answer or communication from the Town Administrator about the request. This is a violation of The Freedom of Information Act granted per the FOIA to promote transparency and accountability to those in public office. We move to sue The Town Hall, The Mayor Ronnie Purnell and The Town Administrator Fonda Patrick.

On or about December 21, 2023. Mr. Washburn, Mr. Hutson and Mr. Thompson once again travelled to the town hall to file a FOIA request with the Town Administrator one Fonda Patrick, and to hopefully do a FOIA request with the Blackville Police Department while simultaneously turn in Complaint forms. Mr. Washburn, Mr. Hutson and Mr. Thompson again were filming their experience as part of freedom of the press. Mr. Washburn noticed a man dressed in what appeared to be police attire. Mr. Washburn asked for this public servants job title, name and badge number to know with whom I was making contact with. This officer who failed to ID and refused us any service without an appointment/ID was later found to be one Chief Ray Crawford. We were ultimately denied the right to file the appropriate documentation for our FOIA request.



Joshua Washburn



Ethan Hutson

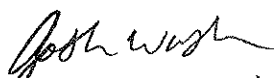



Jackson Thompson

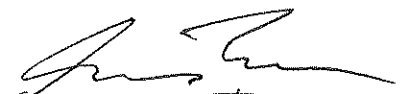
### STATEMENT: Incident #3

On or about January 10, 2024. Mr. Washburn and Mr. Hutson traveled to the Blackville Town Hall/police department to turn in some officer complaint forms and to collect more for future violations. Once there, we noticed one police Chief Ray Crawford taking pictures of Mr. Washburn on a cell phone while sitting at his desk. Mr. Washburn told him not to delete the pic/video for it is now a public record and deleting it would be considered destruction of evidence. After the pleasant experience with the window receptionist Miss Thomas Mr. Washburn and Mr. Hutson left.

While walking to meet with there ride, Mr. Washburn noticed an unmarked police vehicle LP# URT-455 following them by using streets to stay close to keep an eye on both Mr. Washburn and Mr. Hutson. This was harassment by a public servant for his feelings about being investigated. While walking on Highway 78 Mr. Washburn and Mr. Hutson began to film the vehicle because they were sure they were being followed. When Chief Ray Crawford noticed the cameras were rolling, he made an immediate right turn without turn signal initiating a car accident with the car behind him. This is also on film.

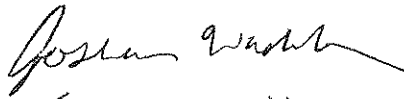
  
Josh Washburn

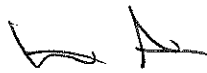
  
Ethan Hutson

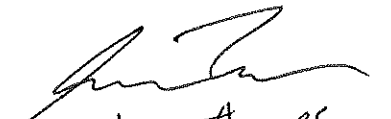
  
Jackson Thompson

## STATEMENT: Incident #4

On or about January 11, 2024 Mr. Washburn, Mr. Hutson and Mr. Thompson; traveled to the Blackville Town Hall to attempt to schedule an appointment with the Mayor Ronnie Purnell of Blackville, SC. After speaking with the window receptionist for the water department, Mr. Hutson was put on the phone with one Town Administrator Fonda Patrick. Miss Patrick instructed Mr. Hutson that there was no way to set an appointment to speak with the Mayor and that the Mayor had instructed her to deal with the case. Once again Fonda Patrick has shown her true colors of tyranny by blocking a private tax paying citizen from talking to an elected Public Servant. Violations of the First Amendment to redress our elected officials are clear and present with video/audio to support.

  
Joshua Washburn

  
Ethan Hutson

  
Jackson Thompson



B. What date and approximate time did the events giving rise to your claim(s) occur?

on or about Dec 2023 - Jan 2024

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

See attached State mvtg

#### IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Financial strain, psychological torture, depression  
anxiety, stress,

**V. Relief**

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

*\$3 million dollars punitive. The Constitution is the Supreme Law and any violation to it should be supreme as well so this does not happen to anyone else.*

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: *Jan 30*, 2024

Signature of Plaintiff

*[Handwritten signature]*

Printed Name of Plaintiff

*Joshua D Washburn Ethan Hutson Jackson Thompson*